

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-33948 (MI)

Jointly Administered

**Related Dkt. Nos.: 724, 1284,  
1285, 1286, 1290 & 1436**

**NOTICE OF EXHIBITS AND WITNESSES TO BE OFFERED BY LEXON  
INSURANCE COMPANY, IRONSHORE INDEMNITY INC. AND IRONSHORE  
SPECIALTY INSURANCE COMPANY AT THE JUNE 18, 2021 HEARING**

Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company (collectively, “Lexon”), file this witness and exhibit list for the hearing scheduled for June 18, 2021 at 9:30 a.m. (prevailing Central Time) (the “Hearing”).

**EXHIBITS**

Lexon intends to offer the Indemnity Agreement attached hereto as **Exhibit “A”**, and attached as Exhibit “A” to the *Objection By Lexon Insurance Company, Ironshore Indemnity Inc. and Ironshore Specialty Insurance Company To The Motion Of Debtors For Entry Of An Order For Confirmation Of The Debtors’ Fourth Amended Joint Chapter 11 Plan Of Fieldwood Energy LLC And Its Affiliated Debtors* [Dkt. No. 1436] at the Hearing. Further, Lexon reserves the right to introduce or rely upon any exhibit designated by the Debtors, or by any other party, and to introduce any exhibit, document, or

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

information to rebut or impeach any statement or testimony. Lexon also reserves the right to rely on any pleadings or exhibits previously filed on the Court's docket.

**WITNESS LIST**

Lexon reserves the right to call and examine any witness designated by the Debtors, or by any other party. Lexon also reserves the right to call any witness required for rebuttal.

**RESERVATION OF RIGHTS**

Lexon reserves the right to seek to introduce any other testimony or exhibits or to supplement this disclosure as may be permitted by the Court.

Dated: June 15, 2021

Respectfully submitted,

/s/ Lee E. Woodard

Lee E. Woodard, Esq.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of June 2021, a true and correct copy of the foregoing Exhibit and Witness List was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned case.

/s/ Lee E. Woodard  
Lee E. Woodard